

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DAVIS v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-1716-CC;  
SAENGSI PHAN v. WORLD CHAMPIONSHIP WRESTLING, INC. and  
TURNER SPORTS, INC., CIV. FILE NO. 1:00-CV-1719-CC;  
SPEIGHT v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-1718-CC;  
WORTHEN v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-1717-CC;  
REEVES v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-1720-CC;  
EASTERLING v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-1715-CC;  
ONOO v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-0368-CC;  
NORRIS v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-0369-CC;  
WALKER v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., CIV. FILE NO. 1:00-CV-0367-CC;  
PATTERSON v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
SPORTS, INC., and TURNER ENTERTAINMENT GROUP, INC.,  
CIV. FILE NO. 1:00-CV-1152-CC;

THIS DEPOSITION CONTAINS INFORMATION DESIGNATED  
CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER

DEPOSITION OF BOBBY L. WALKER, JR.  
FEBRUARY 22, 2002  
10:00 A.M.



CERTIFIED COURT REPORTERS

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1 talking with you about your history with WCW and try to  
2 take you through that. We'll use some documents and some  
3 other things. Okay?

4 A Okay.

5 Q Now, I'm correct that you first came to WCW  
6 in the summer of 1993? Is that correct?

7 A In '94.

8 Q '94? Are you sure about that? Let me go  
9 ahead and see if this will help.

10 (Whereupon, the court reporter  
11 marked Defendant's Exhibit 1  
12 for identification.)

13 BY MR. PONTZ:

14 Q Mr. Walker, I've handed you what's been  
15 marked Defendant's Exhibit 1. And it purports to be a  
16 training agreement and release between you and WCW dated  
17 July 1993.

18 And on the second page, there's a  
19 signature. Is that your signature of Bobby L. Walker?

20 A Yes.

21 Q Does it appear to you based on this  
22 deposition (sic) that you started with WCW in the summer of  
23 1993?

24 A Yes.

25 Q All right. And it looks like you signed on

1 to be a trainee at the Jonesboro, Georgia training  
2 facility. Do you remember training in Jonesboro?

3 A Yes.

4 Q At a facility called Power Plant?

5 A Yes.

6 Q Was this your first experience with  
7 professional wrestling of any kind?

8 A Yes.

9 Q You could, if you want, put that down for a  
10 second. How did you get involved in professional  
11 wrestling?

12 A I had always watched it as a kid. And I was  
13 approached by Thunderbolt Patterson at a gym. And he was  
14 impressed with the amount of weight I could bench press,  
15 and he got me involved from there.

16 Q You were working out at a gym just to keep  
17 in shape or were you playing sports or --

18 A Just to keep in shape.

19 Q Were you active in any kind of participatory  
20 sports at the time other than, you know, recreational  
21 stuff? Did you do anything seriously, play on serious  
22 teams or compete or anything like that?

23 A No.

24 Q So you were just lifting weights to work out  
25 and keep in shape?

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1. A Yes.

2 Q And how did you know Mr. Patterson?

3 A I have seen him in the past on the TV as a  
4 wrestler. And we became friends at the gym we was training  
5 at.

6 Q Where was the gym?

7 A Riverdale Work-out America.

8 Q And he just approached you and said, what  
9 did he say? Do you recall?

10 A He wanted to know if I was interested in  
11 wrestling. He thought there might be an opportunity at  
12 that time.

13 Q How did you get from that to signing a  
14 contract with WCW?

15 A I was invited to go down to the training  
16 facility. From that time, Ole Anderson was also involved.  
17 And the agreement between Ole Anderson and Thunderbolt was  
18 to bring me in as his son, as well as Ole's son, which was  
19 Brian Anderson, and we was going to tag team.

20 Q So let me make sure I understand. Ole  
21 Anderson, who was with WCW, and Thunderbolt Patterson  
22 talked about creating two new wrestling characters, Bobby  
23 Walker, who would be billed out as Thunderbolt Patterson's  
24 son?

25 A Yes.

1 Q And then Brian Anderson who would be billed  
2 as Ole Anderson's son?

3 A Yes.

4 Q You wouldn't actually be Mr. Patterson's  
5 son, that would be the character; right?

6 A Yes.

7 Q So did Mr. Patterson bring you to the Power  
8 Plant to meet folks there?

9 A Yes.

10 Q Now, do you understand that a lot of the  
11 folks who trained at the Power Plant had to pay to train at  
12 the Power Plant?

13 A After, yes.

14 Q And some of them paid, are you aware,  
15 \$3,000 --

16 A Yes.

17 Q -- to train there?

18 But you didn't have to pay to train there;  
19 right?

20 A No.

21 Q They actually signed you to this contract  
22 which paid you to train there; right?

23 A After a time, yes.

24 Q Well, this contract indicates that you were  
25 going to get paid up to \$400 a week, \$80 a day or \$400 a

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1 week. Is that your recollection of things?

2 A Yes.

3 Q All right. And you understood from the  
4 beginning with your contact with WCW that the wrestlers  
5 with WCW, including yourself, are independent contractors;  
6 right?

7 A Yes.

8 Q Do you know who at WCW made the decision to  
9 sign you to this agreement?

10 A Ole Anderson.

11 Q You think it was Ole Anderson?

12 A Yes.

13 Q Did he tell you that it was his decision to  
14 sign you or is that just what you inferred from the  
15 situation?

16 A Just inferred it from the situation.

17 Q Great. Now, this agreement says that it  
18 will end October 17, 1993, right, but did you continue  
19 beyond October of '93 training with WCW?

20 A Yes.

21 Q So they extended, I guess, the arrangement,  
22 just kept you going in the same arrangement for at least a  
23 little while longer?

24 A Yes.

25 Q And were there some other wrestlers at the

1 same time, some white wrestlers as well who were kind of  
2 treated the same way, you guys all came in and continued  
3 training? Are you aware of that or not? Do you know?

4 A There was a few.

5 Q Do you remember a guy named Craig Pittman?

6 A Yes.

7 Q And he was down there training?

8 A He came after, a year or so after me.

9 Q You think so?

10 A Yes.

11 (Whereupon, the court reporter  
12 marked Defendant's Exhibit 2  
13 for identification.)

14 BY MR. PONTZ:

15 Q Let me show you Defendant's Exhibit 2. This  
16 is a document, you may not have seen, but I want to ask you  
17 about it. This document indicates that your contract, the  
18 document Defendant's 1 we were just looking for, what they  
19 agreed, WCW agreed to extend it. And they did that for  
20 yourself and a gentleman named Jeff Gann.

21 Do you remember Mr. Gann?

22 A Yes.

23 Q And Bryant Rogowski and Craig Pittman. Do  
24 you remember those gentlemen as well?

25 A Yes.

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1 Q Were they white wrestlers?

2 A Jeff Gann and Bryant.

3 Q Were white wrestlers?

4 A Yes.

5 Q And then Craig Pittman was?

6 A Black.

7 Q So there were four wrestlers all kind of  
8 training down there, and they kept, according to this at  
9 least, they kept them on training under whatever contract  
10 they had previously had with WCW; right?

11 A No.

12 Q You don't think so?

13 A No.

14 Q How do you know that?

15 A There was a lot more wrestlers than this.

16 Q But at least these four --

17 A Yes.

18 Q -- were among the people who were being kept  
19 on to train with WCW?

20 A Yes.

21 Q Great. And do you remember then about April  
22 of the next year, April of 1994, signing an independent  
23 contractor agreement with WCW? If you're not sure whether  
24 you remember or not, that's okay.

25 A Not sure.



1 (Whereupon, the court reporter  
2 marked Defendant's Exhibit 3  
3 for identification.)

4 BY MR. PONTZ:

5 Q Let me give you a copy of a document, what's  
6 been marked Defendant's Exhibit 3. This is a copy of an  
7 independent contractor agreement. And if you look on the  
8 last page, well, let's go to the second-to-last page, the  
9 page marked Page 10, if you go one page earlier than that.

10 A Okay.

11 Q Is that your signature there?

12 A Wrong page. Yes.

13 Q And on Page 10, it lists an address of a PO  
14 Box in Riverdale?

15 A Yes.

16 Q And then on Page 11, you signed it again?

17 A Yes.

18 Q And this is an agreement to pay you \$800 a  
19 week as a wrestler; right?

20 A Yes.

21 Q And it's a one-year agreement, it looks  
22 like, it'll last to the next April, April '95; right?

23 A Yes.

24 Q So at this point, you were wrestling and  
25 training and working with WCW, right, as an independent

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1 contractor wrestler?

2 MR. GERNAZIAN: Objection to the extent you're  
3 using independent contractor as a legal basis. You can ask  
4 him whether or not he understood what the agreement  
5 represented.

6 BY MR. PONTZ:

7 Q Did you understand, Mr. Walker, that you  
8 were working as an independent contractor when you were a  
9 wrestler with WCW pretty much throughout your time with  
10 WCW?

11 MR. GERNAZIAN: And I'm going to just continue for  
12 all these questions to the extent it's asking for a legal  
13 conclusion.

14 MR. PONTZ: Understood.

15 BY MR. PONTZ:

16 Q Mr. Walker, would you go ahead and answer  
17 the question? Was it your understanding you were working  
18 as an independent contractor of WCW when you were a  
19 wrestler with WCW?

20 A Yes.

21 Q And that's what this agreement says, in  
22 fact; right? It has, if you'll look on Page 3 for me, it  
23 has a whole section called independent contractor; right?

24 A Yes.

25 Q Great. All right. And so you were

1 wrestling with WCW back in 1994, you were training at the  
2 Power Plant; is that right?

3 A Training, yes.

4 Q Did you have opportunities to practice  
5 wrestling?

6 A I don't understand.

7 Q Well, in addition to lifting weights and  
8 things like that, you were learning how to be a wrestler at  
9 the Power Plant; right?

10 A Yes.

11 Q So you were wrestling with other trainees?

12 A Yes.

13 Q Wrestling in matches?

14 A At the facility, yes.

15 Q Did you have opportunities to wrestle  
16 outside the facility?

17 A Only after Bryant came down.

18 Q Bryant Rogowski?

19 A Yes.

20 Q Why was that?

21 A Ole wouldn't put me on payroll until his son  
22 came from college. He refused to.

23 Q Was Mr. Rogowski Mr. Anderson's real son?

24 A I'm not sure.

25 Q But it was your understanding, well, you

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1 were on the payroll on this contract; right?

2 A Yes.

3 Q Because you were getting paid?

4 A Yes.

5 Q So I'm not sure I understand what you mean  
6 by he wouldn't put you on payroll.

7 A Before I signed this agreement, I was  
8 already at the facility. We didn't sign, I didn't sign  
9 this until actually Bryant was there. So I had to wait. I  
10 had to continue to work my other job and to come down to  
11 the training facility until Bryant got there before I was  
12 put on this contract.

13 Q Do you know why that was done?

14 A No.

15 Q What other job did you work back in '94?

16 A Warehouseman.

17 Q Where did you work as a warehouseman?

18 A Fairburn, Georgia.

19 Q And what was the company?

20 A Owens Corning.

21 Q How much did you make in that job? Were you  
22 paid by the hour?

23 A Yes.

24 Q And what were you paid by the hour roughly?

25 A 14 and some change.

1 Q 14 dollars an hour?

2 A Yes.

3 Q Were you working pretty much full-time?

4 A Yes.

5 Q And when did you go to the Power Plant,  
6 then, to train? Did you work a day shift at the warehouse  
7 or a night shift at the warehouse?

8 A Night shift.

9 Q So you went to the Power Plant in the day?

10 A Yes.

11 Q And you were being paid for training at the  
12 Power Plant under these contracts at the same time, and you  
13 were working at the warehouse as well to earn additional  
14 money; right?

15 A No.

16 Q I don't understand, then.

17 A Once I got on payroll here, I quit at Owens  
18 Corning.

19 Q So when you signed this agreement in '94,  
20 you stopped working at the warehouse?

21 A Yes.

22 Q Thanks for clearing that up for me. Do you  
23 know who made the decision to sign you to this contract in  
24 1994?

25 A I'm not sure.

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1           Q       That's fine. And when you signed as a  
2 wrestler, no one promised you you'd be a star; right? They  
3 just promised you, hey, we'll sign you to a contract and  
4 you'll learn how to wrestle?

5           A       No.

6           Q       What is the "no" to my question? Did  
7 someone promise you you'd be a star?

8           A       No. It goes deeper than that. When I was  
9 brought in, I was told I wouldn't -- at that time, they was  
10 looking for athletes. They just didn't want bodies in the  
11 ring. And that was my understanding, that I would work  
12 toward a promising career as a pro wrestler. So I wasn't  
13 just a guy they just pulled off the street.

14          Q       Right. They thought you had some potential?

15          A       Yes.

16          Q       And you understand that being a professional  
17 wrestler is more than just the physical wrestling skills;  
18 right?

19          A       Yes.

20          Q       And it's more than just how big you are or  
21 how quick you are?

22          A       Yes.

23          Q       It also includes your character and persona;  
24 right?

25          A       Yes.

1 Q And your ability to communicate with an  
2 audience; right?

3 A Yes.

4 Q Whether it's by words or by actions; right?

5 A Yes.

6 Q You've got to be an entertainer?

7 A Yes.

8 Q It's an athlete and an actor all together?

9 A Yes.

10 Q Wrapped up in one package; right?

11 A Yes.

12 Q So it's a pretty unique skill?

13 A Yes.

14 Q Not everybody can do it by any stretch of  
15 the imagination; right?

16 A No.

17 Q Would you agree with me that sometimes there  
18 are some people that you might not expect would be good at  
19 it, but for some reason, they click with a crowd or they  
20 make people laugh or entertained? Or there's some people  
21 that you'd look at and say, I don't think that guy will  
22 make it, and lo and behold, people seem to like him?

23 A No.

24 Q You don't think so?

25 A No.

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1 Q Are there people sometimes who you were sure  
2 would make it, you looked at them and said, God, I'm sure  
3 the crowd will love that guy, and then it turned out the  
4 crowd didn't?

5 A No.

6 Q So you were always 100 percent right on  
7 everybody you pegged?

8 A No.

9 Q Well, then, I don't understand how you're  
10 answering my questions. People have differences of  
11 opinion. I imagine somebody comes walking in the Power  
12 Plant, and the other wrestlers there might have differences  
13 of opinion over whether they think that guy is going to be  
14 any good or not; right?

15 A Yes.

16 Q And somebody might look at him and say, he's  
17 too small, and lo and behold, he works out anyway; right?

18 A Yes.

19 Q Or somebody might look at him and say, that  
20 guy's slow or that guy's boring, and yet he works out okay;  
21 right?

22 A Yes.

23 Q And somebody might look at him and say, I  
24 don't find that guy funny when other people think he's  
25 hysterical?



1 A Yes.

2 Q So that opinions certainly vary, and there's  
3 no, it's not like a mathematician where there's a right  
4 answer to the math problem and there's a wrong answer to  
5 the math problem, it's much more judgment call, right, as  
6 to who's going to make it and who's going to be good, and  
7 everybody has their opinion; right?

8 A Everybody has their opinion, yes.

9 Q Great. Now, while you were down at the  
10 Power Plant in this kind of era of 1994, so under this  
11 contract, how often did you go to the Power Plant?

12 A Five days a week.

13 Q And what time did you get there?

14 A From between 10:00 and 10:30 a.m. until 4:00  
15 or 5:00 p.m.

16 Q Was that pretty much most days?

17 A Yes.

18 Q And you were, I assume, working with  
19 weights; right?

20 A Yes.

21 Q And taking some instruction on wrestling?

22 A Yes.

23 Q And practicing?

24 A Yes.

25 Q Now, if you didn't come on a particular day

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1 because you were sick or didn't feel well or had something  
2 personal to take care of, you just didn't come; right? I  
3 mean, you were allowed to not come; right?

4 A No.

5 Q What would happen to you if you didn't come?

6 A It would jeopardize my contract.

7 Q Well, it would slow your progress in  
8 training; right?

9 A It would jeopardize my contract altogether.  
10 Because I signed the agreement to be there, so I had to be  
11 there.

12 Q Under the contract?

13 A Yes.

14 Q That's fine. Now, let me hand you another  
15 document.

16 (Whereupon, the court reporter  
17 marked Defendant's Exhibit 4  
18 for identification.)

19 BY MR. PONTZ:

20 Q This is Defendant's Exhibit 4. And this is  
21 another independent contractor agreement that's dated April  
22 of 1995, a year after the one we looked at before. Okay?

23 A Okay.

24 Q And will you look at the second-to-last page  
25 for me, Page 10. Is that your signature?

1 A Yes.

2 Q And then on Page 11, that's your signature  
3 again?

4 A Yes.

5 Q Now, this was another agreement for you to  
6 remain as a wrestler working with WCW for \$800 per week;  
7 right?

8 A Yes.

9 Q Now, was that the same amount as the  
10 contract in 1994, \$800 a week? Do you recall? We can look  
11 at the document. It says what it says. But do you  
12 remember it being about the same amount of money --

13 A Yes.

14 Q -- in '94 and '95?

15 A Yes.

16 Q And again, it was your understanding you  
17 were an independent contractor wrestler with WCW under that  
18 contract?

19 A Yes.

20 Q All right. Great. You don't know who made  
21 the decision to sign you to that 1995 contract, do you?

22 A No.

23 Q And let me hand you another document.

24 (Whereupon, the court reporter  
25 marked Defendant's Exhibit 5

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1 for identification.)

2 BY MR. PONTZ:

3 Q This is Defendant's 5. Take a look at that  
4 for us, would you please. This is another independent  
5 contractor agreement with WCW. And it's dated April 25th  
6 of 1996. So again, one year later; right?

7 A Yes.

8 Q And if you'll look at Page 10, is that your  
9 signature again?

10 A Yes.

11 Q And on Page 11 as well, your signature?

12 A Yes.

13 Q And now, if you'll look at Page 11 for me,  
14 this document indicates that it's a one-year contract;  
15 right?

16 A Yes.

17 Q And that it will automatically renew; right?

18 A Yes.

19 Q So in other words, at the end of the year,  
20 if the company doesn't say no, you'll have another year's  
21 contract; right?

22 A Yes.

23 Q And this contract, it looks like, was going  
24 to pay you \$85,000; right?

25 A Right.

1 Q That's a pretty big salary bump from what  
2 you were making before; right?

3 A Yes.

4 Q And it looks like that it can be, this  
5 contract could be ended with 30 days' notice; right?

6 A Yes.

7 Q Before the end of the term, they can tell  
8 you, but unless they give you 30 days' notice before the  
9 end of the term, it's going to roll over and be another  
10 contract again; right?

11 A Yes.

12 Q Were you happy about getting this contract?

13 A Yes.

14 Q Good contract?

15 A Yes.

16 Q You don't know who was responsible for  
17 deciding to give you this contract, do you?

18 A Eric Bischoff.

19 Q How do you know Eric Bischoff was  
20 responsible for giving you the contract?

21 A I had talked to Eric.

22 Q When did you talk to Eric?

23 A In Orlando. I'm not sure of the date.

24 Q It was before you signed this contract,  
25 though?

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1 A Yes.

2 Q And what were you doing in Orlando?

3 A A TV taping.

4 Q So you were wrestling with WCW?

5 A Yes.

6 Q So at some point after you started training  
7 at the Power Plant, you started wrestling in WCW events;  
8 right? In 1995, in 1996, before this contract, you were  
9 wrestling in wrestling events for WCW?

10 A At some point.

11 Q And those events included things like going  
12 to, was it Universal Studios in Orlando?

13 A Yes.

14 Q And you'd go there with other wrestlers and  
15 they'd tape a whole bunch of wrestling shows?

16 A Yes.

17 Q And Eric Bischoff was there, you said?

18 A Yes.

19 Q And did you approach Eric?

20 A Yes.

21 Q And what did you say to Mr. Bischoff? Do  
22 you recall?

23 A I asked him about how he thought I was  
24 doing. And he told me he -- Kevin Sullivan had talked  
25 highly about me. And he asked me how much money I wanted.

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1 your knee was hurt?

2 A Yes.

3 Q Who did you tell?

4 A The guys that I was working with.

5 Q So that they could take precautions or --

6 A Right.

7 Q So you wouldn't hurt it worse or hurt them  
8 because your knee buckles when you're trying to do a move;  
9 right?

10 A Right.

11 Q Let me mark another agreement.

12 (Whereupon, the court reporter  
13 marked Defendant's Exhibit 7  
14 for identification.)

15 BY MR. PONTZ:

16 Q This is Defendant's Exhibit 7. Would you  
17 take a look at that for a moment, Mr. Walker. This is an  
18 agreement dated April 25, 1997. So this is one year after  
19 the last agreement we looked at; right?

20 A Right.

21 Q And as we discussed it, and if you want to  
22 look back at the other agreement, you can, that other  
23 agreement was going to automatically renew if they, if WCW  
24 didn't terminate it; right?

25 A Right.

1 Q And you?

2 A And me.

3 Q What was "Hardwork" Bobby Walker's image?

4 What kind of character were you trying to portray?

5 A Something positive. You work your butt off  
6 knowing you have to start at the bottom. And in time, with  
7 hard work and patience and faith, you'll get to where you  
8 want to be.

9 Q And how did you dress when you were  
10 "Hardwork" Bobby Walker in that character? Was it just  
11 regular wrestling tights with "Hardwork" on them?

12 A Yes.

13 Q Nothing, no masks or fancy hairdos or  
14 outrageous costumes or anything like that?

15 A No.

16 Q Just pretty simple, straightforward  
17 wrestling tights?

18 A Yes. I wanted to be me.

19 Q And what were your actions as a character  
20 "Hardwork"? Were they kind of a straightforward, blue  
21 collar hard working guy? Is that a reasonably good  
22 description?

23 A Define "blue collar."

24 Q Well, a hard working guy; right?

25 A Yes.



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1 Q You know, the kind of guy who puts in a full  
2 day's effort every day and every time?

3 A Right.

4 Q Nothing flashy or showy?

5 A No.

6 Q And nothing cocky or brash?

7 A Nothing.

8 Q Just a regular, solid guy?

9 A Yes.

10 Q Now, one of the things you did as part of  
11 your wrestling moves was kind of a step out onto the top  
12 rope and then you'd leap off the rope onto your opponent;  
13 right?

14 A Yes.

15 Q So you'd kind of climb up the ropes and then  
16 take a step or two on the ropes and then leap off and land  
17 on the opponent? Is that a good description of it?

18 A It goes a little deeper than that.

19 Q Well, you describe for me what you would  
20 do. This was your finishing move; right?

21 A Right.

22 Q Did it have a name?

23 A At first, it was the flying airborne off the  
24 top. And then it was just walking the ropes.

25 Q What would you do? Describe this move for

1           Q       In the summer of 1997, think back to the  
2 summer of 1997, do you recall hurting your knee?

3                   And this may have been a different knee than  
4 the one you hurt in Germany, but it may not have. Do you  
5 recall having any knee problems back in 1997?

6           A       I can't recall.

7           Q       Let me ask you, if you would, take a look at  
8 that document with the little black clip there. It's  
9 Defendant's Exhibit 6; right?

10          A       Right.

11          Q       And if you'll take a look through, a couple  
12 of pages through, I think on the fourth page, actually,  
13 let's go to the third page, this is a medical report. Do  
14 you remember seeing a Dr. Gibbons?

15          A       Gibbons.

16          Q       You may not have seen him. He may have  
17 looked at an x-ray or something like that. I don't know.  
18 But do you remember seeing a Dr. Gibbons?

19          A       No.

20          Q       This report, this page here indicates that  
21 you were seen for a sprained right knee, that you twisted a  
22 knee jumping off the rope in June of '97. Do you recall  
23 that?

24          A       I don't recall.

25          Q       But it's possible it happened?

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1. A Possible.

2 Q All right. And then do you remember getting  
3 an MRI on your knee in '97?

4 A I'm not sure.

5 Q Do you remember having some medical  
6 restrictions in kind of summer of '97 while you were  
7 awaiting an MRI?

8 A I can't remember.

9 Q If you'd turn to the next page for me, this  
10 is a document, it seems to indicate that there was a  
11 possibility that you had torn your ACL in '97. Do you  
12 remember that now?

13 A It's so far, I can't remember.

14 Q That's fine. And then the next page, it  
15 looks like there was an MRI done on your right knee.

16 A '97.

17 Q And let me jump ahead a little bit. You did  
18 have ACL surgery in '98? Do you recall that?

19 A Yes.

20 Q On your right knee?

21 A I'm not sure what knee.

22 Q One of the knees?

23 A Yeah.

24 Q Is it possible that this was when you first  
25 hurt your knee and you put off surgery for a while?

1           A           Let's see. '98. I don't know if I put it  
2 off.

3           Q           Let me have you take a look, keep turning a  
4 couple more pages, there's a page that at the very bottom  
5 says, it has a number that's 19740. Keep turning a couple  
6 more pages to 19740, probably the one right before that.

7                       Is that 19740 at the very bottom right  
8 corner?

9           A           Yes.

10          Q           This is a document, have you ever seen this  
11 before?

12          A           No.

13          Q           This document indicates that you got a  
14 diagnosis of an ACL tear in your right knee. You do  
15 remember having surgery to repair an ACL tear in your knee;  
16 right?

17          A           Yes.

18          Q           And there is a note here that says work  
19 status that says, "No wrestling until seen back." Do you  
20 remember being put on, told by a doctor not to wrestle  
21 until you come back in for another appointment around then?

22          A           I'm not sure.

23          Q           It's possible it happened, but you don't  
24 remember?

25          A           Yes.

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1 Q All right. And then in the right corner of  
2 that document, there's something that says, "Patient wants  
3 to think about surgery, possibly seek second opinion."  
4 Does that sound like something you might have done?

5 A Yes.

6 Q The doctor says I want to do surgery, and  
7 you say, whoa, let me think about it?

8 A Yes.

9 Q And then do you recall having the surgery on  
10 your knee in 1998, ACL surgery?

11 A Yes.

12 Q Maybe in March?

13 A Yes.

14 Q And are you not sure whether it's your right  
15 knee or you're pretty sure or hard to remember?

16 A I'm not sure. I don't know.

17 Q But if the records indicate that you had  
18 surgery on your right knee in March of '98, do you have any  
19 reason to think that's incorrect?

20 A No.

21 Q That's fine. And then after you had  
22 surgery, I assume you were out for a while rehabilitating  
23 the knee?

24 A Yes.

25 Q How much time did you spend rehabilitating

1 the knee before you were back to wrestling? Do you recall?

2 A Let's see. '98. I'm not sure.

3 Q A few months at least?

4 A Yes.

5 Q And do you remember doing physical therapy  
6 in, like, the summer and early fall of '98?

7 A Yes.

8 Q Great. And that was to rehabilitate the  
9 knee?

10 A Yes.

11 Q All right. I think we may be done with that  
12 document. Now, February of 1998, do you remember being  
13 informed that, under the terms of your contract, you were  
14 going to be let out of your contract, that you were going  
15 to be what they call cycled out in early 1998?

16 A What you mean by "cycled"?

17 Q Well, I tell you what, let's look back at  
18 your contract, which is Defendant's Exhibit 7.

19 A 7. Okay.

20 Q And if I'm not mistaken, the last page of  
21 the contract says that they have to give you notice.

22 MR. GERNAZIAN: What number are we on?

23 MR. PONTZ: Defendant's 7. I'm sorry.

24 BY MR. PONTZ:

25 Q Actually, go ahead and look at Page 6 for

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1 me, would you?

2 A Six?

3 Q Yes.

4 A Okay.

5 Q There's a clause that says Term and

6 Termination; right? And Part B says this agreement, "The

7 term of this agreement shall be divided into consecutive

8 three-month periods." And "During any such period, WCW may

9 terminate this agreement." And it says something about

10 giving you at least one month prior notice.

11 Do you remember being told that WCW was

12 going to terminate your contract in April of 1998?

13 A Yes.

14 Q And did they tell you this in about February

15 of 1998? Does that sound about right?

16 A Yes.

17 Q Do you remember who told you?

18 A J.J. Dillon.

19 Q What did J.J. tell you?

20 A He called me in from the training facility.

21 I was out training at the Power Plant, said, "I have some

22 bad news, but I'm just the messenger."

23 Q This is what J.J. said?

24 A Yeah. "We're having a cutback. And

25 unfortunately, you are one of the guys."

1 Q So that's what J.J. told you?

2 A Yes.

3 Q And you were upset about that, I take it?

4 A Yes.

5 Q Did you ask to talk to Eric Bischoff about  
6 it?

7 A Not at that time.

8 Q But at some point, you asked to talk to Eric  
9 about it?

10 A Yes.

11 Q Why did you ask to talk to Eric about it?

12 A Because he had just gave me a two-year  
13 contract.

14 Q Did you understand he was somebody who could  
15 do something about it?

16 A Yes. He was the one in control.

17 Q And you did meet with Mr. Bischoff?

18 A Yes.

19 Q Was this the first time you'd really raised  
20 any kind of complaint with WCW about your contract or  
21 issues like that?

22 A Yes.

23 Q And you had a face-to-face meeting with  
24 Mr. Bischoff?

25 A Yes.



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1 Q And you asked him for another opportunity or  
2 asked him to stay on or what did you ask Eric for when you  
3 spoke with him?

4 A I remember asking Eric, I just signed a --  
5 "I don't understand why I was cut. You just gave me a  
6 two-year contract."

7 Q And he offered you, at that time, didn't he  
8 offer to re-sign you to a contract, but it was a contract  
9 you didn't like the terms of; right?

10 A Yes.

11 Q And so you turned down the contract that he  
12 offered you? He said, well, I'll sign you to a new  
13 contract, Mr. Walker, but you didn't like the terms of that  
14 agreement?

15 A Yes.

16 Q And actually, WCW, in fact, sent you a copy  
17 of that proposed contract, and you didn't sign it and  
18 didn't do it?

19 A Yes.

20 Q And instead of doing that, at that time, you  
21 instituted an action against WCW alleging race  
22 discrimination; right?

23 A Yes.

24 Q You filed a charge of discrimination with  
25 the EEOC?

1 A Yes.

2 Q And do you know what happened to that EEOC  
3 charge?

4 A I'm not sure.

5 Q Let me have this marked.

6 (Whereupon, the court reporter  
7 marked Defendant's Exhibit 9  
8 for identification.)

9 BY MR. PONTZ:

10 Q Let me have you take a look at Defendant's  
11 Exhibit 9. Do you remember receiving this document from  
12 the EEOC?

13 A Yes.

14 Q And this is a document, it's a dismissal of  
15 notice of rights, and this was for the EEOC charge you  
16 filed in 1998 against WCW?

17 A Yes.

18 Q And it indicates on the first page that the  
19 reason the charge is being dismissed is because there's no  
20 employee/employer relationship; right?

21 A Right.

22 Q Great. And then you, after the EEOC charge  
23 was resolved or dismissed by the EEOC, you filed a lawsuit  
24 with a lawyer against WCW?

25 A Yes.

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1 Q And in the lawsuit, you attempted to raise  
2 claims and allegations of discrimination over a number of  
3 years, right, about how you'd been treated as a wrestler at  
4 WCW?

5 A Yes.

6 Q And you claimed discrimination in various  
7 kinds of things, your wrestling opportunities, your pay,  
8 your treatment, things like that; right?

9 A Opportunity, yes.

10 Q Now, it's real important you just tell me  
11 the answer to this question. You settled that lawsuit  
12 against WCW; right?

13 A Right.

14 MR. PONTZ: Let me go ahead and mark the next  
15 portion of this deposition transcript confidential.

16 (Whereupon, the following testimony is  
17 contained in the confidential transcript.)  
18  
19  
20  
21  
22  
23  
24  
25

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1 contractor agreement between you and WCW signed January 1,  
2 1999; right?

3 A Yes.

4 Q And on the second-to-last page, Page 15, is  
5 that your signature?

6 A Yes.

7 Q You've added "Hardwork" to it this time, but  
8 it's still your signature; right?

9 A Yes.

10 Q And then on Page 16, is that also your  
11 signature?

12 A Yes.

13 Q And so this was an agreement starting in  
14 January 1 of 1999 for \$100,000 a year, and it was a  
15 two-year contract; right?

16 A Right.

17 Q And was it your understanding that this was  
18 a guaranteed contract that you'd be paid for both years?

19 A Yes.

20 Q And just jumping ahead, you were, in fact,  
21 paid \$100,000 a year in 1999 and in 2000 by WCW; right?

22 A Right.

23 Q And again, was it your understanding that  
24 you were going to continue under this contract the  
25 relationship with WCW as an independent contractor

1 wrestler; right?

2 A Right.

3 Q Great. So in 1999, you're back wrestling  
4 with WCW; right?

5 A Right.

6 Q And were you working out at the Power Plant  
7 on occasion to keep your skills sharp?

8 A I was told I had to come back to the Power  
9 Plant, yes.

10 Q Who told you that?

11 A In the meeting with Eric Bischoff, he had  
12 requested that I go to the Power Plant for about two weeks  
13 to get my ring fitness back.

14 Q Is that in part because you'd had the knee  
15 surgery?

16 A Right.

17 Q So he wanted to give you a couple weeks to  
18 get the, as they say, the ring rust off; right?

19 A Right.

20 Q And you were okay with that, I assume?

21 A Yes.

22 Q And then you were wrestling after those  
23 couple of weeks?

24 A No.

25 Q Well, did you wrestle at some point in 1999?

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1 A Yes.

2 Q And then you did wrestle as well in 2000;  
3 right?

4 A Yes.

5 Q On WCW events?

6 A Yes.

7 Q Various different shows and house shows and  
8 TV shows and things like that?

9 A No. No house shows.

10 Q No house shows, just TV shows?

11 A Just the Saturday night show and one  
12 Thunder.

13 Q That was in 1999?

14 A Yes.

15 Q Did you wrestle in a Nitro in 2000?

16 A No.

17 Q Where did you wrestle in 2000 that you  
18 recall?

19 A I was on a dark match, a Thunder, one  
20 Thunder.

21 Q When you say "a dark match," tell me what  
22 your understanding of a dark match is.

23 A It's not televised.

24 Q So it's a match before the television show  
25 starts?

1 Q Go ahead and answer the question. Do you  
2 know what WCW thought about your knee status in 2000?

3 MR. GERNAZIAN: Same objection.

4 BY MR. PONTZ:

5 Q You can answer the question.

6 A No.

7 Q No?

8 A (Whereupon, the witness shook his head  
9 negatively.)

10 Q Now, the contract that you signed in January  
11 1 of '99, that expired at the end of 2000; right?

12 A Yes.

13 Q Two-year contract?

14 A Yes.

15 Q And it did, in fact, expire and you stopped  
16 being under contract to WCW at December 31st of 2000;  
17 right?

18 A Yes.

19 Q You don't know whether other wrestlers had  
20 their contracts expire near the end of 2000 or the  
21 beginning of 2001, do you?

22 A No.

23 Q So it's possible that other wrestlers had  
24 contracts that expired and those contracts were let to  
25 expire as well; right?

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1 Q If there was ever a time when you thought  
2 I'm sick, I feel bad, I can't wrestle today, you would just  
3 let folks from WCW know that and you didn't wrestle;  
4 right? That's the way it worked; right?

5 A You let them know when you're sick.

6 Q Or hurt?

7 A Or hurt.

8 Q And when you let them know you were hurt or  
9 sick, you didn't have to wrestle; right?

10 A Yes.

11 Q All right. And as a wrestler, when you  
12 wrestled, you brought kind of the unique skills that you  
13 had as Bobby "Hardwork" Walker to the ring; right?

14 A Right.

15 Q And you didn't file reports or do things  
16 like that on your services, you just came and you wrestled  
17 and you trained and you didn't have to report on your  
18 progress or things like that to anybody; right?

19 A Every so often, Kevin would check in on me,  
20 ask me how I'm doing, I'm still down here in training.

21 Q Kevin Sullivan would check in --

22 A Yes.

23 Q -- just to see how you were doing?

24 A Yes.

25 Q But was that more, you think, just a



1 friendship kind of thing?

2 A Yes.

3 Q And you provided your own clothes and  
4 equipment when you wrestled; right?

5 A Yes.

6 Q And you and, you said, Pez Watley came up  
7 with your name and ring character?

8 A Yes.

9 Q While you were wrestling, you said,  
10 originally, you were working at the, at a warehouse. After  
11 that, after you stopped working at the warehouse, while you  
12 were wrestling with WCW, did you ever work anywhere else?

13 A No.

14 Q Nothing else at all?

15 A Just WCW.

16 Q Could you have gotten another job in your  
17 free time at the warehouse or something like that?

18 A No.

19 Q Why not?

20 A I was at the Power Plant from 10:00, it was  
21 set up from 10:00 to 5:00. I was there most of the time  
22 for, I know for well over four or five years, maybe four  
23 years. I still was going through the same thing that the  
24 guys came in years after me. I was still doing the  
25 squats. I was still running the ropes. I was still doing

1           A           Other -- mostly the few blacks we had.  
2   Mostly the few blacks we had, we stayed and we did what we  
3   needed to do.

4           Q           Well, did some of the white wrestlers help  
5   out with that, I assume?

6           A           Some.

7           Q           Yes. Do you know why others didn't help  
8   out?

9           A           Others?

10          Q           Any of the wrestlers who didn't help out  
11   with that stuff, do you know why they didn't?

12          A           Most of the time, they did.

13          Q           Most of the time, they helped out?

14          A           As far as the blacks. It was almost like we  
15   really didn't have a choice.

16          Q           Why do you say that?

17          A           It was --

18          Q           Is that just your feeling?

19          A           It was if you didn't, you had a bad  
20   attitude. You're part of WCW. So we always, you know, had  
21   to pick up a broom or --

22          Q           Help out?

23          A           -- help out or --

24          Q           Wasn't that true of all the wrestlers at the  
25   Power Plant, that if you didn't help out like that, you had

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1 a bad attitude?

2 A No, no. Some of the white wrestlers left  
3 early. Some of the guys that even had been there a year,  
4 they'll come in, they'll do their little ring thing and  
5 they would leave. They didn't stay.

6 Q Do you know why that was?

7 A I don't know. I have no idea.

8 Q Now, when you were in the ring wrestling, a  
9 lot of the performance had to do with your, you know, your  
10 creativity and your imagination; right?

11 A Some.

12 Q You were told what the outcome was supposed  
13 to be; right?

14 A Correct.

15 Q But how you got there was up to you and the  
16 other wrestler, right, pretty much?

17 A Pretty much.

18 Q You know, you had to decide how you get  
19 certain things to happen, how you get from point a to point  
20 b; right?

21 A Right.

22 Q And you knew what your finishing move was  
23 going to be, but you had to figure out how to set them up  
24 for it; right?

25 A Right.

1           A       Different based on what he, the plans were  
2   to do with me.

3           Q       What did he tell you that the plans were for  
4   you?

5           A       Well, he just said he had -- he didn't  
6   elaborate. I know he requested I change my name from  
7   "Hardwork."

8           Q       What else did he request?

9           A       He requested that I also stay in shape,  
10   which wasn't an issue. And that was about it.

11          Q       What did you ask him about in terms of  
12   getting a push?

13          A       Basically what -- you have any plans for  
14   me. And also, I also talked to Eric Bischoff.

15          Q       When did you talk to Mr. Bischoff?

16          A       I talked to Bischoff in February.

17          Q       Of what year?

18          A       '99.

19          Q       So this was after you signed the contract,  
20   the two-year contract in January of '99, you talked to him  
21   in February of '99?

22          A       That's correct.

23          Q       What did you talk to him about?

24          A       I talked to him about the -- my future at  
25   WCW. Because as I recall, the meeting kept getting put

1 start a new slate. What I want you -- he wanted me to go  
2 down to the training facility for two weeks to get in ring  
3 shape. And I done that. And he was pretty short.

4 And he left the door open. I remember  
5 that. He left the door open. And then he said, "Well,  
6 we'll come up with different things from there." And that  
7 was basically the bulk of the meeting.

8 Q Did you ever ask to meet with him another  
9 time beyond that?

10 A Not that I recall.

11 Q And this meeting with, this discussion with  
12 Terry Taylor about pushing, you said there was one before  
13 1999, there was one that was after 1999 when you were  
14 talking about the name "Hardwork" and what to do about  
15 that; right?

16 A Correct.

17 Q Was it just the two times that you talked to  
18 Terry Taylor about getting a push?

19 A I talked to Terry Taylor a lot when he was  
20 at the Power Plant. At one time, Terry Taylor had a bad  
21 relationship with Eric Bischoff, so he was sent down to the  
22 school to be a trainee --

23 Q When was this?

24 A -- be a trainer.

25 Q When was this?

1           A           Right. And to make an angle out of the  
2 bench press, which have been done in the past.

3           Q           That was an idea that he suggested he might  
4 use with you?

5           A           Yeah. He suggested a few ideas, but it  
6 never came to play. So I guess a few weeks later, before  
7 we went to Orlando, was scheduled for a taping in Orlando,  
8 I was trying to get another meeting with him, and he kept  
9 putting it off. Then he said, "Well, I'll just talk to you  
10 in Orlando."

11                   And after a few times, we did talk in  
12 Orlando. And I basically went up to him just like I would  
13 talk to him at the training facility, man to man. Just  
14 because he had the booking there, it wasn't I'm about to  
15 look down or talk a certain way. I respected him just like  
16 he respected me.

17                   So I asked him, I was like, "Terry, now that  
18 you got the book, you got the power, what you going to do?  
19 What is my future here at WCW?" He came up with different  
20 angles, well, you know, get with Kevin, get with Teddy,  
21 y'all come up with different ideas, this and that.

22                   And I done that. I think a few days later,  
23 Teddy Long told me that "Terry Taylor didn't appreciate you  
24 questioning, he didn't appreciate a black man questioning  
25 him."

1 good old redneck company. And Terry Taylor don't like  
2 you."

3 Q So Terry Taylor had personal animosity  
4 against you?

5 A Yes.

6 Q And it was --

7 A I don't know why.

8 Q And it was Kevin's opinion that you wouldn't  
9 get a fair shake?

10 A Kevin witnessed a, when they go to the war  
11 room, this wasn't -- during the course of the week, the  
12 bookers, all the important people get together and make out  
13 the schedule and what shows, who's going to be where.

14 And Kevin told Teddy Long, "Tell Bobby to be  
15 careful, because Terry Taylor is out to get him." He said,  
16 "Tell him he can't afford to mess up in the ring at all."

17 Q Because Terry Taylor had a personal  
18 animosity with you?

19 A Yes. And I, and when I talked to Teddy, I  
20 said, "I don't know why. I just talk to him the same way  
21 I'm talking to you." So from there, everything went  
22 downhill.

23 Q How about your conversation with Jimmy Hart  
24 about getting a push, when was that?

25 A That was in '99.

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1 Q Where was that? Do you recall?

2 A That was on the Saturday night shows. After  
3 the two weeks that I went down and I seen nothing was  
4 happening, you know, I wasn't on the mailing list, it was  
5 like I didn't even exist, like a big -- I didn't exist. I  
6 was at home and Paul Orndorff -- maybe I'm getting off the  
7 track here. Paul Orndorff called and said, "You need to be  
8 at the school."

9 Q And when did you have your conversation with  
10 Jimmy Hart --

11 A Jimmy --

12 Q -- about getting a push?

13 A Jimmy, I had the conversation with Jimmy  
14 Hart when they had decided they was going to turn me heel.  
15 And Jimmy had, was taking over the Saturday night show,  
16 and he wanted me on his show.

17 He was all for the walking the ropes,  
18 because it was different. He said, "Bobby, people love  
19 it. It's different. I'll work you on my show." At that  
20 time, he had the power. He was running the Saturday night  
21 show.

22 Q And he did put you on the Saturday night  
23 show?

24 A He put me on the Saturday night show in '99.

25 Q Do you believe Jimmy Hart discriminated



1 against you on the basis of your race?

2 A Jimmy tried to be fair. But there was  
3 only --

4 Q But you don't think Jimmy Hart made  
5 decisions about you based on your race, him personally?

6 A Jimmy tried to stay out of it without  
7 putting his job at risk.

8 Q Do you think Kevin Sullivan made any  
9 decisions about you on the basis of your race?

10 A Kevin tried to stay out of it, too.

11 Q So you don't think --

12 A You got to understand, Kevin --

13 MR. GERNAZIAN: Let him finish his answer.

14 BY MR. PONTZ:

15 Q Go ahead.

16 A When they seen Kevin or Jimmy talking to a  
17 black too long, you just basically crossed the line. So  
18 they would have short conversations, they would have short  
19 conversations with me. There are times when Kevin walked  
20 by me and say, "Just take the money. They're not going to  
21 use you," and keep walking.

22 Q When you say "they," when they see Kevin or  
23 Jimmy talking to you, who's "they"? Who are you talking  
24 about?

25 A Terry Taylor, Arn Anderson, Eric Bischoff,

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1 being put on the payroll until Bryant got there. After  
2 about, I guess about six months, he seen how frustrated I  
3 was and he said, "Listen, Bobby, the only reason you're  
4 here is because they need color on the TV. That's the only  
5 reason."

6 Q This was 1994?

7 A Between, yes, '93, '94.

8 Q And do you know on what basis Mr. Mulligan  
9 made that statement?

10 A He seen how frustrated I was.

11 Q Was that just his opinion, do you think,  
12 that the reason you were there was because of your color?

13 A I strongly believe it was his fact.

14 Blackjack was always pretty honest with me.

15 Q But you don't know, he wasn't on the booking  
16 committee, was he?

17 A No. He was hired to train us.

18 Q So you don't know why, just because a  
19 trainer said to you you're here because of your race, you  
20 don't know if he actually got that information from anyone  
21 who was making the decisions about who would wrestle and  
22 who would not wrestle, do you?

23 A I'm not sure.

24 Q And this was back in '93 or '94 that  
25 Mr. Mulligan said this to you?

1     only going so far.

2                 Q         But he didn't say it had anything to do with  
3     your race?

4                 A         No.

5                 Q         All right. Anything else that you think  
6     Mr. Bischoff did that discriminated against you on the  
7     basis of your race?

8                 A         I was told by Sonny Onoo that, in a  
9     particular match, I was walking the ropes, and I don't know  
10    what happened, but it came from Eric Bischoff to "Get that  
11    nigger off my ropes."

12                Q         When was this match? Do you recall?

13                A         I can't recall.

14                Q         Is this before you filed your first claim  
15    against WCW?

16                A         I can't recall.

17                Q         You don't remember at all when this was?

18                A         No.

19                Q         You don't know whether this was before you  
20    came back in January 1999 with the new deal or not?

21                A         I can't recall. It's so much, the file is  
22    so thick, I'm not really sure.

23                Q         And what you're telling me is that Sonny  
24    Onoo told you that Eric said to someone, do you know who  
25    Eric supposedly said that to?

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1           A       I'm not sure. I also think Moses also heard  
2 it, because it was on the earpiece.

3           Q       And who's Moses?

4           A       Moses was a guy that worked off the ring  
5 truck and helped set up and stuff like that.

6           Q       All right.

7           A       And I do remember Moses telling me, "Maybe  
8 you shouldn't just walk them, because the odds are against  
9 you." I just --

10          Q       So you heard from Sonny and from Moses some  
11 statements that Eric was upset with you walking the ropes;  
12 right?

13          A       Yes.

14          Q       And Sonny told you that he heard that Eric  
15 had used the "N" word?

16          A       Yes.

17          Q       But you don't know whether he did or not,  
18 that's just what people told you; right?

19          A       Yes.

20          Q       Anything else that Mr. Bischoff did that you  
21 believe was discriminatory?

22          A       Eric Bischoff made a comment when we was  
23 here on a Nitro in Atlanta that "This is a white night,  
24 because no niggers going to be on the show."

25                   I wasn't on that show that particular

1 night. As I recall, the blacks was taken off the show. He  
2 made the comment that "Blacks would not pay to come to a  
3 Nitro. They'd rather watch it on TV."

4 Q Let me back up a little bit. You didn't  
5 hear Mr. Bischoff say, "This is white night." Right?

6 A Right.

7 Q Somebody told you that he supposedly said  
8 that?

9 A Yes.

10 Q Who told you that?

11 A Teddy Long and Harold Hogue.

12 Q Teddy Long and who?

13 A Harold Hogue.

14 Q Did they say they heard it or did they say  
15 someone told them?

16 A Teddy said he heard it.

17 Q And then you made another comment that you  
18 attributed to Eric Bischoff. You didn't hear that either;  
19 right?

20 A I don't understand.

21 Q What you just testified to about Eric at  
22 this show at the Nitro, you weren't around for that; right?

23 A Right.

24 Q You didn't hear any of that?

25 A Not from Eric.

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1 Q People just told you that Eric supposedly  
2 said that?

3 A Well, at the time, Teddy was managing me, so  
4 I heard it from Teddy.

5 Q But you don't know whether it happened or  
6 not, it's Mr. Long's testimony, not testimony, Mr. Long's  
7 statement to you that that's what happened?

8 A Yes.

9 Q Anything else that Mr. Bischoff said or did  
10 that you believe was discriminatory against you because of  
11 your race?

12 A No.

13 Q How about Terry Taylor?

14 A I apologize ahead of time if I tend to get a  
15 little aggressive about Mr. Taylor.

16 Q Well, let me do it this way. Let me start  
17 off first by saying tell me all the things you think that  
18 Mr. Taylor did to discriminate against you on the basis of  
19 your race before you filed your first claim. Let's break  
20 it down time frame that way.

21 A Before I filed the first claim.

22 Q Let's cover all the things you think he did  
23 before your first claim.

24 A Okay.

25 Q Can you do that first for me?

1 MR. GERNAZIAN: Based on his race?

2 MR. PONTZ: Based on his race.

3 BY MR. PONTZ:

4 Q What I want to know is what it is you  
5 believe Mr. Taylor did to discriminate against you on the  
6 basis of your race before you first filed a claim against  
7 WCW.

8 A Okay.

9 Q Tell me what those things were.

10 A One was he made the, he was a little mad  
11 because, at that time, I think I was making more money than  
12 him, so he say. And he was down at the Power Plant talking  
13 and pissed and mad and all this, and this is the same time  
14 he made the comment in front of me, Ernest Miller and Bill  
15 Goldberg that "Y'all are only here because you're black.  
16 Other than that, you wouldn't be here."

17 After Terry Taylor got the book, after Eric  
18 had promoted him or whatever, when I went to Mr. Taylor  
19 about my position at WCW and discussed that with him, tried  
20 to get a meeting there in Atlanta, but we ended up trying  
21 to discuss it in Orlando, and he made the, you know, the  
22 comment that a black man shouldn't question him.

23 I don't know, a week or two, I don't know  
24 what the time frame, but when I got back to Atlanta, I had  
25 walking papers. And I couldn't figure out why. And then

1 that were portrayed with WCW?

2 A Not that I recall.

3 Q And no one ever said to you, hey, if your  
4 persona was a negative stereotype, you would have gotten a  
5 push, but because it's "Hardwork," we're not pushing you;  
6 right?

7 A Could you re --

8 Q Did anyone ever say to you the thing that's  
9 holding you back is your good guy image of "Hardwork"  
10 Walker?

11 A No.

12 Q What --

13 A Kevin Sullivan informed me the reason that I  
14 wasn't going to go nowhere in WCW was because I was black.  
15 And it was a good old boy neckwork. And even little things  
16 that they done helped demonstrate it, helped demonstrate  
17 that, by not putting me on shows or telling me to come back  
18 to the school and stuff, things like that.

19 Q That's the kind of stuff we already talked  
20 about; right?

21 A Right.

22 Q Can you tell me some wrestlers who you  
23 believe weren't as qualified as you who you think got a  
24 push?

25 A How long you have?



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1 Q Well, as long as we need, Mr. Walker.

2 MR. GERNAZIAN: We need another jar of cookies.

3 THE WITNESS: Disco Inferno, I seen Disco leap  
4 before me like it was, bam, he was gone. And I was there  
5 way before he was.

6 BY MR. PONTZ:

7 Q Do you know who was responsible for giving  
8 Disco Inferno that push?

9 A Eric Bischoff, Terry Taylor and the booking  
10 committee.

11 Q Do you know why they pushed Disco Inferno?

12 A I don't know.

13 Q Who else?

14 A Chris Canyon, who also came in after me, got  
15 a lot of time on TV, went to the pay-per-views, done the  
16 Saturday night shows. Most of these guys done every show,  
17 Saturday night, Thunder, Nitro, pay-per-view.

18 Q Do you know, I'm sorry, do you know who was  
19 responsible for giving Canyon this push?

20 A Eric Bischoff and Terry Taylor are or who  
21 was ever the booking at that particular time. Of course,  
22 Eric Bischoff was the president or vice president. Then  
23 you got the top booker who would make the major decision  
24 and take it to Eric.

25 You got people like Courageous, who came in

1 way after me, got better contract deals, was -- stayed on  
2 Saturday night shows just for a minute, went straight to  
3 Nitro, done the pay-per-views.

4 Q How do you know he had a better contract  
5 deal than you?

6 A It's word of mouth.

7 Q What did you think his contract was?

8 A I think his contract started out when he  
9 first came in at about \$75,000, but I'm not for sure. I  
10 know Disco, I didn't, I haven't seen their checks or  
11 anything like that, I know Disco made good wages. Billy  
12 Kidman, who only stands about two feet two --

13 Q Well, actually, Mr. Kidman and  
14 Mr. Courageous were cruiser weight wrestlers, right, much  
15 smaller than you, under kind of a different grouping of  
16 wrestlers; right?

17 A They started out that way.

18 Q Right.

19 A But Kidman rebounded way over Courageous.  
20 If I'm not mistaken, Kidman even done an angle with Eric  
21 Bischoff. If I'm not mistaken, he done an angle with  
22 Hogan. This is a guy that I seen mess up in the ring  
23 plenty of times and nothing was ever said, and they still  
24 pushed him to the center.

25 Q Is it possible, Mr. Walker, that the reason

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1 folks like these gentlemen you mentioned, and I'm sure you  
2 could mention others, isn't it possible that it was just  
3 Eric Bischoff's opinion that they were more entertaining  
4 than you were?

5 A No.

6 Q That's not possible?

7 A Kidman didn't have anything different he  
8 do. I don't -- what did he bring to the table? The only  
9 thing he done was do a flip off the top rope. And I seen  
10 plenty of times he messed that up even on live TV.

11 Q Mr. Walker, there's more than just the moves  
12 in the ring; right?

13 A Right.

14 Q There's the whole personality, there's  
15 interviews; right?

16 A Right.

17 Q There's just the way they interact with the  
18 audience and with other wrestlers in the storylines; right?

19 A Right.

20 Q Isn't it possible Mr. Bischoff just thought  
21 Mr. Kidman did a better job at that than you?

22 A Kidman couldn't do what I do in the ring.  
23 Kidman couldn't walk the ropes. He didn't have the nerve  
24 to get up there. No white had the nerve or had the  
25 ability.

1 I have seen him trying even before, when I  
2 get there early, some of them be out there practicing, they  
3 fall before they even get up there. None of them had  
4 the -- there wasn't nobody else that could walk the ropes  
5 like me.

6 Kidman brought to the -- Kidman didn't have  
7 no excitement in the ring. When he got, when he was in the  
8 heat spot, when he was getting beat down, that wasn't no  
9 more fire as far as excitement when he came alive than me.

10 Q In your opinion?

11 A Well, it's on tape. So it would be close --  
12 well, in my opinion, yes. And what they classify as fire  
13 and the excitement. You be getting beat down and all of a  
14 sudden you get a breeze, and now the baby face coming back  
15 and coming back, after that first big move, you know, okay,  
16 now you're okay, now you're pissed off because what the  
17 heel have just done to you, and this is supposed to show  
18 excitement.

19 Q And you didn't think Kidman had that?

20 A No.

21 Q Is it possible Eric Bischoff did think  
22 Kidman had that?

23 A It's possible. Evan Courageous, he didn't  
24 have that.

25 Q In your opinion?

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1           A           In my opinion. Because they went by, when I  
2 first came to WCW, we went through the different steps of  
3 how to be a good and great professional wrestler. You have  
4 to go in stage one of baby face, have to appeal to the  
5 people. They need to be well liked.

6                   And then in phase two, you know, they have  
7 to get the people to feel sorry for them, they getting beat  
8 down. Then in phase three, all of a sudden, the baby face  
9 come back on top, he's excited, he get beat down, now the  
10 people go crazy.

11                   And most of the white guys' matches, they  
12 didn't go, they didn't get that excitement on the last  
13 stage. But they still was able to get a major push. Hugh  
14 Morris. I mentioned Billy Kidman. Lash LaRue. Guys came  
15 in way after me. Even Bill Goldberg. All Bill had to do  
16 was scream and yell.

17           Q           But the crowd loved him; right?

18           A           Yeah. But they put it on the TV enough,  
19 they pushed him in his face. They seen Bill every Saturday  
20 night. They seen Canyon every Saturday night, every  
21 Saturday evening, every Nitro that would lead up to the  
22 pay-per-view.

23                   And if they put you on the TV long enough,  
24 you could point your finger and the people will yell,  
25 because they know that's what you're about to do. When you

1 do, when you point your finger, they know something  
2 exciting is about to happen.

3 So if the WCW or the promoter puts you out  
4 there and the people see it enough, they know all your  
5 moves. They didn't have nothing no different than me. And  
6 either one definitely couldn't walk the ropes. They didn't  
7 have even the courage to try.

8 Q So what you're saying is the bookers and the  
9 folks like that have to make a judgment call of who they  
10 think is going to be most popular, and then they put them  
11 out there to see if they're popular?

12 A Well --

13 MR. GERNAZIAN: Objection. Compound and misstates  
14 his testimony.

15 BY MR. PONTZ:

16 Q Well, tell me, Mr. Walker, are you telling  
17 me that you could have been as popular at Bill Goldberg?

18 A Yes.

19 Q Why do you believe that?

20 A Because I bring something different to the  
21 table that can't nobody else do in pro wrestling. You got  
22 one guy in WWF, Undertaker, that do it, but he only do it  
23 by holding of another individual's hand. That don't even  
24 look realistic.

25 You got where I could jump up and walk down

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1 to the center or walk at the middle or even get to the  
2 other turnbuckle that people was excited to see. Some of  
3 them wanted me to fall and bust my butt, no doubt, where  
4 they can laugh and say this and that.

5 But half of them were just curious, will he  
6 do it, will he won't do it, even the people on the  
7 headset. And I didn't even know they were placing bets  
8 until Moses told me. And even when I got on the plane, the  
9 production people, "Are you going to walk it today?" "I  
10 don't know. It depends on the situation."

11 So they were actually making bets. And I  
12 remember in the match with Ice Train, the last match I had,  
13 I walked the ropes, and the officer said, "How do you do  
14 that?" I said, "Faith and balance."

15 Everybody, I had the crowd, but I never got  
16 the push to push it down their throat like all the white  
17 guys got. They told Bill he had to yell at a certain  
18 point. "Bill, you got to do this. Yell. Go crazy." And  
19 he came in only with two moves. It went over.

20 Q Right.

21 A No doubt. Simple reason, they put him on  
22 the TV every week. Simple reason, Evan Courageous, they  
23 put him on the TV. He had the major shows, Nitro, which  
24 was a major show that lead up to your pay-per-views. You  
25 had Billy Kidman who got put in major angles.

1           You had Disco who came in with numbers and  
2     gimmicks, and some of them that didn't work. But they kept  
3     trying. Some of them didn't work. You had people like  
4     Glacier, who Eric Bischoff invested a lot of money in, a  
5     lot of money, and it didn't even work.

6           Q       Obviously --

7           A       They didn't do that for us, for me. They  
8     didn't put that -- you know, Glacier had all kind of, he  
9     came in after me, too, Glacier had all kind of stuff. They  
10    pushed it in the Saturday night show. They started it out  
11    at the Universal just to see will it work.

12           A lot of money was invested in Glacier's  
13    gimmick that the company paid for, and then they find out  
14    it don't work. And then they had tried to come up with  
15    something else, and that didn't work.

16           Q       Are you telling me that, because you could  
17    walk on the ropes and other wrestlers didn't, then they  
18    should have made you a star because of that ability?

19           A       I'm saying I should have got the opportunity  
20    to be a star. I'm saying I could have, I should have got  
21    the opportunity. I shouldn't have had the pressure like I  
22    had. If you mess up, you're fired. That's the kind of  
23    pressure.

24           And when I came back in '99, even though I  
25    was aware, if you mess up, you're basically gone, but so I



1 BY MR. PONTZ:

2 Q How do you know that?

3 A When Terry Taylor stated that he didn't feel  
4 like a black man should question him, I know Terry Taylor  
5 have a personal negative feeling about blacks. He  
6 demonstrated it. It wasn't personal, it was a black and  
7 white issue. It's a racism issue. He was -- he got Steve  
8 Regal to try to make me mess up.

9 Q According to Mr. Regal?

10 A Yes. It wasn't personal. It was a racial  
11 thing. And that was hard to, it was hard to bite your  
12 tongue off, but you had to bite your tongue because you're  
13 working under a racist society.

14 You got to understand, when you done gave up  
15 your job making 14 dollars, at that time was good money,  
16 and now still good money, and that, you know, took  
17 everything off the line, and now you here, you're at the  
18 mercy of someone else that controls every move you make. So  
19 you have to bite your tongue and say okay, whatever.

20 And along the way, you see the white  
21 athletes getting pushed in '99 when I was there. I seen  
22 Kidman do the angle with Hogan and Bischoff. I seen where  
23 Bill went. I seen all the merchandise Bill got. I seen  
24 the merchandise Kidman got.

25 I seen the, all the position Buff Bagwell

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1 was put in. Buff wasn't no better than me. We was the  
2 same size. He couldn't do half what I could do. He got a  
3 major, major push. Kidman got a major push. These guys  
4 come after me.

5 And for me to sit at home, not get used,  
6 sign a two-year contract, and every time I look at TV, I  
7 got a problem, because when I see Kidman or some of the  
8 guys that came down before me, it was hard for me to  
9 understand because that's where I'm supposed to be if I  
10 was, had been given the same opportunity as the white guys.  
11 And I wasn't.

12 Q I understand. I understand. Is there  
13 anything else you can think of that we haven't talked  
14 about, any other incidents of race discrimination that we  
15 haven't already talked about that you think happened to you  
16 at WCW?

17 A Other than I wasn't given the same  
18 opportunity as far as merchandise and pay and contracts and  
19 the nights on the major TV.

20 Q Well, hang on a second. You were signed to  
21 contracts pretty much throughout this period other than the  
22 period of 1998; right?

23 A Right.

24 Q So you got contracts. Is your complaint  
25 simply that you should have been paid more under the

1 contracts?

2 A I should have been able to advance. In WCW,  
3 in pro wrestling, \$100,000 is like six dollars an hour out  
4 here in this world. You're talking about people that are  
5 making seven figures. \$100,000 was just a, you got --

6 Q Who was making seven figures, Mr. Walker?

7 A I think Goldberg. I'm not really for sure.

8 Q Anybody else you think was making seven  
9 figures?

10 A I'm not sure. But I think people like  
11 Disco, whose wages kept going up as long as he was with the  
12 company, as long as he got the opportunity to portray his  
13 persona on TV. Kidman, who kept advancing. Goldberg, who  
14 kept advancing. Courageous, who kept advancing. Hugh  
15 Morris, who kept advancing.

16 You got all these guys that, by them being  
17 on the TV, they can go in and negotiate their contract.  
18 They got opportunity to advance, where I didn't. They're  
19 almost like you should be grateful to be here. I never had  
20 the opportunity to advance.

21 Q And merchandising, what is it that you think  
22 you should have gotten in terms of merchandising  
23 opportunities that you didn't get? Is that more, again, of  
24 not being on TV?

25 A I think it's just not being on TV. If I was

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1 put on TV, and if I would have had the same opportunity as  
2 the white guys, the merchandise would have been there. I  
3 could have got a t-shirt with me walking the ropes on it.  
4 That never happened. I could have got any type of  
5 merchandise that the whites got, but I was never given the  
6 opportunity to get that.

7 Q All right. Any other claims, any other  
8 things you think, facts you believe support your claims of  
9 discrimination that we haven't already talked about?

10 A No.

11 Q All right. You claim, Mr. Walker, in your  
12 complaint that you were subjected to a racially hostile  
13 work environment.

14 A Yes.

15 Q Other than the things you've already  
16 testified about, is there anything else that you believe  
17 made your work environment racially hostile, or is it just  
18 the things you've already testified about?

19 A No. There's a lot of other things.

20 Q Well, what are they?

21 A As far as the whites getting the better  
22 contracts, and which we already talked about. The -- when  
23 I came back to WCW in '99, that was a very tough decision I  
24 had to make. Because now, the environment is about to be  
25 very hostile, the simple reason, I got my job back.

1                   And the way things had happened in the past,  
2 I'm now having to be extra careful in the ring, because you  
3 don't know if a guy's going to make a mistake or if it's  
4 really going to be a legit mistake.

5                   When I walked through the dressing room and  
6 locker room and half of the whites don't even speak, from  
7 the bookers down. When you, even when a few of the whites  
8 thought I had an excellent match, they would just say good  
9 match and keep going because they couldn't be associated  
10 with me because it would put their job on the line.

11               Q           How do you know that, Mr. Walker?

12               A           From some of the things that Kevin Sullivan  
13 said, from the relationship Kevin Sullivan had with a black  
14 girl that he was doing an angle with.

15               Q           Well, tell me about that. I don't  
16 understand. I need to know the facts and the basis for why  
17 you, what is it that Kevin Sullivan said to you that made  
18 you believe --

19               A           They got rid of a black girl because Kevin  
20 was doing an angle with her and they became too much  
21 friends as far as they having a working relationship  
22 together. Sooner or later, they ended up firing her, who  
23 she ended up being in New York now.

24               Q           Who was she?

25               A           Jacqueline.

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1 Q Do you remember her real name?

2 A I think Jacqueline was her -- I don't know  
3 her last name.

4 Q Anything more than Jacqueline that you can  
5 remember?

6 A No.

7 Q And you're telling me Kevin was doing an  
8 angle with her?

9 A Yes.

10 Q And who do you think got rid of her?

11 A I think Eric Bischoff. I think Eric  
12 Bischoff and the booking committee. Ultimately, it was  
13 Eric Bischoff.

14 Q Do you know why Eric got rid of Jacqueline,  
15 according to your testimony?

16 A The rumor was that Kevin was getting too  
17 close to her. That was one of the rumors.

18 Q Who told you that?

19 A That was, Teddy Long was my manager at the  
20 time, and Teddy would talk about it. And even Booker T.  
21 and Stevie Ray.

22 Q So other wrestlers said the rumor is that's  
23 why Jacqueline left?

24 A Yeah. They fired her.

25 Q But you don't know if that's actually what

1 happened?

2 A No. No. You know, that environment was so  
3 hostile. Because I had to be careful in whatever I done.  
4 Like I say, half of the guys didn't speak.

5 Q You talked about people not talking to you.  
6 You talked about having to be careful not to make a  
7 mistake; right?

8 A Right.

9 Q What else about your environment do you  
10 believe was racially hostile?

11 MR. GERNAZIAN: You mean in addition to what he's  
12 previously identified?

13 MR. PONTZ: Correct.

14 BY MR. PONTZ:

15 Q In addition to those things you've  
16 previously identified, what else about your environment do  
17 you believe was racially hostile?

18 A Just basically the way they done things, the  
19 attitude, basically what I have already discussed.

20 Q Any statements that were made to you that  
21 you believe were racially hostile?

22 A As I was at one of the shows, I don't  
23 remember which one it was, I always had to get there early  
24 because I couldn't afford no mistakes. So I always got to  
25 the shows early. As I was walking past the war room, which

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1 is where the bookers meet, the word "nigger" was used. I  
2 don't know who said it. But the comment was, "What nigger  
3 we got tonight?"

4 Q You don't know who said it?

5 A I don't know who said it. I know it was the  
6 war room. I know it's the bookers are the ones, the only  
7 ones that is in the war room. And the bookers are the only  
8 ones that are there that early. And hearing remarks like  
9 that --

10 Q Did you ever hear any other remarks like  
11 that or was it just that one time?

12 A Teddy told me that Arn Anderson had called  
13 him a nigger point blank in front of his face.

14 Q When was that supposedly to have happened?

15 A I don't know. I don't know.

16 Q Anything else that you can recall that you  
17 believe contributed to your hostile work environment other  
18 than what you've already testified to?

19 A I'm not sure.

20 Q Can you think of anything else?

21 A Let's see. Not right now.

22 Q Well, if you do, we need to hear about it.

23 A Okay.

24 Q But that's all you can think of, sitting  
25 here today, that's all you can think of that contributed to



1 your hostile work environment, according to your  
2 allegations?

3 A Yes.

4 Q When you claim you heard the "N" word come  
5 from this war room, as you described it, did you say  
6 anything to anyone about it?

7 A No. I just kept walking.

8 Q And you don't know who said it?

9 A No.

10 Q And you don't know what they were talking  
11 about or what they were referring to or anything else?

12 A They was laughing. That's for sure. I know  
13 what they was referring to. Basically, what nigger we got  
14 on the card tonight. I know I was there. I don't know who  
15 else was scheduled to be there.

16 Q But you don't know what context that was  
17 said in?

18 A It was in a joking way as far as --

19 Q Right. But you don't know if someone said,  
20 hey, I heard so and so say which nigger we got on the card  
21 tonight?

22 A No.

23 Q So you don't have any idea who was saying it  
24 or why they were saying it?

25 A No.

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1. Q Now, WCW never directed you to wear any  
2 stereotypical ethnic clothing, did they?

3 A No.

4 Q And they never directed you to act according  
5 to negative stereotypes specific to your ethnicity, did  
6 they?

7 A No.

8 Q And they never developed any storylines for  
9 you to create negative fan reaction against you because of  
10 your race; right?

11 A Other than just trying to take the word, the  
12 name "Hardwork" from me. That was about it.

13 Q They never did anything to make the fans  
14 hate you because you were black?

15 A They never put me on the tube enough. So  
16 the fans didn't have an opportunity to know who I was.

17 Q But you never, there was never any time  
18 where WCW folks told you about a match and how they wanted  
19 it to go, and you felt like that was going to make you look  
20 bad because you were black?

21 A With the match with Scott Steiner, if that  
22 would have went.

23 Q Why do you think that would have made you  
24 look bad because of your race? What do you think would  
25 have happened?

1           A           It would have got to where I would have got  
2 absolutely nothing in that match and it's just another  
3 white man beating up a black man that -- when the, the way  
4 it would have been set up, I would have gotten absolutely  
5 nothing. Nothing positive would have happened in that  
6 particular match.

7           Q           But there wouldn't have been anything  
8 specific about your race, that just would have been a match  
9 where a top card guy beat somebody up badly; right?

10          A           In one's opinion.

11          Q           Well, Scott Steiner had lots of matches  
12 where they'd bring out a wrestler and Scott Steiner would  
13 beat the heck out of them; right?

14          A           Yes.

15          Q           And a lot of those wrestlers were white;  
16 right?

17          A           Some was white.

18          Q           According to you, there weren't that many  
19 African American wrestlers; right?

20          A           They would fly, allow some blacks to come in  
21 for maybe \$150 a match or whatever they chose to do just  
22 for them to get squashed by a white guy.

23          Q           But there were lots of whites who got  
24 squashed on a regular basis, too; right?

25          A           There were some.

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1 Q And you squashed some yourself; right?

2 A I never squashed them.

3 Q Did you ever wrestle a guy named Barry  
4 Horowitz?

5 A Yes.

6 Q Didn't Mr. Horowitz pretty much get beat  
7 every time he came out to wrestle?

8 A Well, see, you're mischaracterizing the word  
9 "squash." Squash is when you put the guy in the match and  
10 you don't let them do nothing, you just beat them, beat  
11 them, beat them, beat them. I didn't do that to Barry.  
12 Barry got most of the match.

13 Q But you got over on Barry?

14 A Yes. I won.

15 Q And you did get over on white wrestlers when  
16 you wrestled?

17 A Yes.

18 Q And by "get over," that's kind of the  
19 wrestling phraseology for win and come out as the winner  
20 and the crowd cheering for you or that kind of thing;  
21 right?

22 A Yes.

23 Q Now, you've also got a claim in your lawsuit  
24 for retaliation?

25 A Yes.

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1 Billy Kidman or whatever white was in that position, I  
2 still could not understand why they got their opportunity  
3 and still getting the opportunity and I wasn't.

4 So it caused a problem with my marriage. I  
5 actually started ending up going to a marriage counselor.  
6 Attitude was so bad. The kids seen that. Anything that  
7 could have happened happened.

8 And when, even when I go to the gym, when  
9 the few people do recognize me, they say, "Why you not at  
10 WCW? Why I haven't seen you?" And "I don't know." Or  
11 "Dad, why you not wrestling no more?" "Long story," and I  
12 walk off.

13 Q Well, if I'm understanding you correctly, I  
14 think what you're saying, tell me if I'm wrong, but what  
15 you're saying is the things that you talked about, all the  
16 things you allege were discriminatory, were done to harm  
17 you? Is that what you're saying?

18 A In my opinion, yes.

19 Q Are there any things beyond the things you  
20 talked about in your claims of discrimination that you  
21 think WCW did to try to harm you, or is it just all the  
22 discriminatory things?

23 A I think that the overall thing they tried to  
24 do to harm me was to end my career. And they done that.

25 Q And they did that, in your opinion, by not

1 putting you on TV?

2 A By not putting me on the TV, by shelving me,  
3 putting me on the shelf. I think there still would have  
4 been an opportunity if they would have worked me those two  
5 years.

6 I think, if I would have had the opportunity  
7 to go to, maybe not every show, but maybe the Saturday  
8 night and the Thunder and the Nitro, maybe not even the  
9 pay-per-view, if I would have been given that opportunity,  
10 when my contract was over, I think maybe I maybe could have  
11 negotiated with WWF or even Japan.

12 So they had a plan to destroy it. And  
13 that's what they done. My wrestling career is over.

14 Q And who is "they" in your mind? Who is it  
15 that's the "they"?

16 A Eric Bischoff, J.J. Dillon, Terry Taylor,  
17 Arn Anderson, Paul Orndorff, and whoever else that was in  
18 that control of that network. I think it was a big joke.

19 Q And I guess what I'm trying to make sure I  
20 understand is, if there's anything different in the stuff  
21 we've already talked about in your discrimination claims  
22 that you think was intentionally done to you to harm you,  
23 not about discrimination, but about something else.

24 It sounds like what you're saying is that  
25 all the discriminatory stuff caused you a lot of harm. Is

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1 there anything non-discriminatory, you know, not about  
2 keeping you off the TV because of your race or not giving  
3 you an opportunity because of your race or things you  
4 talked about, is there anything different from that that we  
5 haven't talked about that you think was done to you?

6 A I think it was all based on race.

7 MR. GERNAZIAN: Are you including retaliation when  
8 you're using discrimination?

9 BY MR. PONTZ:

10 Q Well, I guess what I'm trying to say,  
11 Mr. Walker, is that you've got this claim in your lawsuit,  
12 and I understand you didn't, you know, lawyers do these  
13 things, but it's for intentional infliction of emotional  
14 distress.

15 And your lawyer can explain this to you, but  
16 my understanding of it is it means somebody did something  
17 to me intentionally to harm my emotions. And you described  
18 a number of things that you believe were done to you about  
19 discrimination, about retaliation, as all the things you've  
20 talked about so far today.

21 And I'm just trying to see if there's  
22 anything else that we haven't talked about, anything that's  
23 different that you think was part of trying to harm you.

24 A No. Just not overall getting the same  
25 opportunity as the whites.

1           Q       Just the discrimination and the retaliation  
2       you already testified about?

3           A       Right.

4           Q       That's fine. Let me do a couple real quick  
5       clean-up issues.

6                               (Whereupon, the court reporter  
7                               marked Defendant's Exhibit 17  
8                               for identification.)

9       BY MR. PONTZ:

10           Q       This is from some documents you produced,  
11       your lawyer produced to us on your behalf. Is this the  
12       charge of discrimination you filed in February 11, 2000  
13       against WCW that's the basis for your, some of your claims  
14       in this case?

15           A       Yes.

16           Q       All right. And let me give you one other.

17                               (Whereupon, the court reporter  
18                               marked Defendant's Exhibit 18  
19                               for identification.)

20       BY MR. PONTZ:

21           Q       And this is another document. Is that your  
22       signature at the bottom of Defendant's 18?

23           A       Yes.

24           Q       And this is dated March 26, 2001?

25           A       Yes.



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1 Q And this is amending your complaint of  
2 discrimination, your charge of discrimination to include  
3 Turner Sports; right?

4 A Yes.

5 Q Let me ask you about that just a little  
6 bit. Did anything, nothing WCW did changed between  
7 February 11th of 2000 and March of 2001, did they? It was  
8 the same things that you complained about going on? There  
9 was nothing new; right?

10 A Right.

11 Q And you amended your charge to add Turner  
12 Sports. Did you ever work with anyone at Turner Sports  
13 that you're aware of?

14 A All of the, from my understanding, WCW was  
15 Turner Sports. It's like an umbrella.

16 Q What do you mean by that?

17 A They was the one that wrote the paychecks.

18 Q Well, you got paid by WCW; right?

19 A Right.

20 Q And your contract was with WCW; right?

21 A But the check was in Turner Sports.

22 Q There was some letterhead on the check, is  
23 that what you're talking about, or some logo on the check?

24 A Yes.

25 Q Other than the logo on the check, is there

